



Hazardous Waste Compliance Monitoring and Enforcement Log

RECEIVED
MAY 29 2008
A



Handler

ID Number **K S D** **9 8 1** **7 1 2** **8 5 4**

LDF () TSD () GEN () KG (X) SQ () NOT A GEN ()
HWB () UOM () UOB () HWT ()

Handler Name: Sabreliner Corporation

Street: 101 Freedom Drive

City: Independence

County: Montgomery

EVALUATION

New ☒

Followup: Date (on site)

Date (of letter)

Delete ☐

Date **0 5** **1 9** **0 3**

Agency **S**

Type **C E I**

Reason **0 0**

Person **V S O**

District **S E**

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

Generator	
GER	N A
GGR	E V
GLB	E V
GMR	E V
GOR	N A

Transporter
TGR
TMR
TOR
TRR
TWD

Treatment/Storage/Disposal Facility			
DCH		DGW	
DCL		DIN	
DCP		DLB	
DFR		DLF	
DGS		DLT	

Other
BRR
CAS
CSS
FEA
ILD

Used Oil UOM ☐ UOB ☐ UOT ☐ UOP ☐ UOR ☐

COMMENTS

VIOLATION # <u>1</u>		Date Determined 0 5 1 9 0 3	
New <input checked="" type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Comments <input type="checkbox"/>
Agency S	Number 9 8 1 7 1 2 8 5 4	Area G G R	Class 2
Regulation Citation: <u>K.A.R. 28-31-4(c)(1)</u>			
Description: <u>Inaccurate notification -</u>			
facility name, facility mailing			
address, and installation			
contact.			

VIOLATION # _____		Date Determined _____	
New <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Comments <input type="checkbox"/>
Agency S	Number 9 8 1 7 1 2 8 5 4	Area G G R	Class 2
Regulation Citation: _____			
Description: _____			
Returned to Compliance			

VIOLATION # _____		Date Determined _____	
New <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Comments <input type="checkbox"/>
Agency S	Number 9 8 1 7 1 2 8 5 4	Area G G R	Class 2
Regulation Citation: _____			
Description: _____			
Returned to Compliance			

VIOLATION # _____		Date Determined _____	
New <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Comments <input type="checkbox"/>
Agency S	Number 9 8 1 7 1 2 8 5 4	Area G G R	Class 2
Regulation Citation: _____			
Description: _____			
Returned to Compliance			



R00417725

RCRA RECORDS CENTER

Sabreliner Corporation

NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Division of Environment Waste Management Program

Initial Inspection: ☒ Yes No Follow-up Inspection: Yes No Complaint: Yes ☒ No
Hazardous Waste: LDF () TSF () GEN () KG () SQ () UNV () NOT A GEN () OTHER () _____
Used Oil: UOG () UOT () UOM () UOP () UOB ()
Solid Waste: SLF () TRS () CDL () ILF () YWC () SWP () HHW () OBS () MTP () WTM () WTP () WTR () WTT ()

TO: Sabreliner Corporation 5 / 19 / 03
 Facility Name Date
101 Freedom Drive Independence KS 67301 MCG
 Address City State Zip Code County

K	S	D	9	8	1	7	1	2	8	5	4
---	---	---	---	---	---	---	---	---	---	---	---

EPA Identification No.

[illegible]

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

☒ Violations As Follows

☐ No Violations Identified

Citation
1) KAR 28-31-4(c)(1)

Description of Violation	Date	Time	Location	Inspector
Identification - facility name, facility				
and installation contact.				

☐ Other Comments/Concerns:

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 21 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:
VICTORIA S. O'BRIEN
Kansas Department of Health and Environment
Southeast District Office
Waste Management Program
1500 W. 7th
Chanute, Kansas 66720-9701

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (620) 431-2390 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

Victoria J. O'Brien

Date 5, 19, 03

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: JOHN E. HEATHMAN

Signature: Jul 96

Title: ENGINEER

Date 5 / 19 / 2003



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT



**HAZARDOUS WASTE
COMPLIANCE INSPECTION CHECKLIST
COVER PAGE**

General

☒ Routine

☐ Complaint

EPA ID KSD 981 712 854 Time 8:10 a.m. Date 05/19/03
Generator Name Sabreliner Corporation District Southeast
Street 101 Freedom Drive (Airport Industrial Park) City Independence, KS ZIP 67301
Mailing Address (if different than above) Same
County Montgomery Phone (620) 331-8180
Contact(s) John Heathman - Plant Engineer and Calibration Laboratory Technician Fax (620) 331-6426
Inspector(s) Victoria S. O'Brien e-mail jheathman@sabreliner.com
Type of Business Overhauls Jet Engine Turbines, Parts, and Accessories Number of Employees Approximately 26
Operating Hours 7:30 a.m. to 4:00 p.m. Monday - Friday GPS Readings _____

Generator size classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☐ EPA Generator
☐ Not a Generator ☒ Kansas Generator ☐ Transporter

Other Regulated Activities: ☐ T/S/D Facility ☐ Used Oil Activities
(complete applicable checklist) ☐ Tanks ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? No
If yes, explain: _____

Attach all applicable checklists.

If facility is closed/inactive, or has recently moved please provide a brief description here or in an attached summary.

HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION CHECKLIST

Industrial Wastes Generated

(List all solid and hazardous wastes. List hazardous wastes first)

Waste description or process	If waste is hazardous give HW ID Number	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Present disposal methods
Calibration Fluid - Petroleum Nap	D001	110 Gallons Per Year	None	NA	Rineco
Paint Remover - Methylene Chloride Based	D007, F002	110 Gallons Per Year	None	NA	Rineco
Sodium Hydroxide and Phosphoric Acid Solution (Turco 4181 and 4008)	D002	275 Gallons Per Year	None	NA	Rineco
Isopropyl Alcohol - 99%	D001	600 Gallons Per Year	None	NA	Rineco
PD 680 (Petroleum Naphtha Based Cleaner)	D001	220 Gallons Per Year	None	NA	Rineco
Wipes, Paint Filters, Bench Fuel Filters	D007	55 Gallons Per Year	None	NA	Rineco
Magnusol 755 (Cresylic Acid)	D002, F002, F004	<55 Gallons Per Year	None	NA	Rineco
WD40 Lubricant	D001	<55 Gallons Per Year	None	NA	Rineco
Mag-Chem HDL 264 (Potassium Hydroxide)	D002	<55 Gallons Per Year	None	NA	Rineco
X-IT Plus Ultra Cleaner	Nonhazardous	660 Gallons Per year	110 Gallons	NA	Rineco
General Trash	Nonhazardous	5 to 10 Cubic Yards Per Day	NA	NA	City of Independence

General Requirements (GGR)

	YES	NO	NAV #
1. Has the generator evaluated each potentially hazardous waste(s) to determine if it is hazardous? KAR 28-31-4(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? KAR 28-31-4(b)(3)(A)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? KAR 28-31-4(f)(1)(C)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. If waste was not tested, did the generator use process knowledge? KAR 28-31-4(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each subject waste? KAR 28-29-109(c)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a. List the SWDA authorization number(s): _____			
4. If the generator recycles hazardous waste on-site (such as in a still), do they count waste each time prior to its being recycled? KAR 28-31-4(o)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If the waste is not counted, is it exempt because of a closed loop system? KAR 28-31-4(o)	<input type="checkbox"/>	<input type="checkbox"/>	

General Requirements:☒ **Compliance**☐ **Non-Compliance**☐ **NA****Notification Requirements (GGR)**

- | | | | |
|---|-------------------------------------|-------------------------------------|--------------------------|
| 5. Has generator notified KDHE and obtained an EPA Identification Number?
KAR 28-31-4(c)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 6. Is current notification accurate? KAR 28-31-4(c)(1) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Notification Requirements:☐ **Compliance**☒ **Non-Compliance**☐ **NA**

Non-Accumulating Small Quantity Generator

YES NO NA V#

7. If the SQG is accumulating less than 25 kg of hazardous waste on-site,
- a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? KAR 28-31-4(m)(2)
- b. Is the SQG sending this waste off-site for treatment, storage, or disposal? KAR 28-31-4(m)(2)

☐ ☐ ☐☐ ☐ ☐**Non-Accumulating SQG Requirements:**☐ Compliance ☐ Non-Compliance ☒ NA

(small quantity generator not accumulating, stop here)

Accumulating Small Quantity Generator

8. If the SQG is accumulating 25 kg or more of hazardous waste,
- a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? KAR 28-31-4(m)(2)
- b. If the SQG is sending waste off-site for treatment, storage, or disposal, is the waste sent to a TSD or some other approved waste management facility? KAR 28-31-4(m)(2)

☐ ☐ ☐☐ ☐ ☐**Accumulating SQG Requirements:**☐ Compliance ☐ Non-Compliance ☒ NA**Pre-Transport Requirements (GPT)**

9. Does generator package, label (flammable liquid, poison, etc.), and mark (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? KAR 28-31-4(e)
- a. Does generator mark each container of 110 gallons or less as below? KAR 28-31-4(e)(3)(B)

☒ ☐☒ ☐ ☐

Hazardous Waste-Federal Law Prohibits Improper Disposal.

If found, contact the nearest police or public safety authority or the US EPA.

*Generator's Name and Address
Manifest Document Number*

10. Does generator only use a transporter who has registered with the department and obtained an EPA Identification Number? KAR 28-31-4(c)(2)

☒ ☐**Pre-Transport Requirements:**☒ Compliance ☐ Non-Compliance ☐ NA

Storage Requirements (GPT)

YES NO NA V#

- | | |
|--|---|
| <p>11. If generator temporarily stores waste in containers,</p> <p style="margin-left: 20px;">a. Is each container clearly marked with the words "Hazardous Waste"?
 KAR 28-31-4(g)(3) or KAR 28-31-4(h)(4) or KAR 28-31-4(m)(2)(B)</p> <p style="margin-left: 20px;">b. Is the accumulation start date marked on each container?
 KAR 28-31-4(g)(2) or KAR 28-31-4(h)(3) or KAR 28-31-4(m)(2)(B)</p> <p style="margin-left: 20px;">c. Are all containers holding hazardous waste in good condition and closed during storage except when necessary to add or remove waste? KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)</p> <p style="margin-left: 20px;">d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors?
 KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)</p> <p style="margin-left: 40px;">A. If yes, are these inspections documented in a log that includes complete date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions? KAR 28-31-4(k)</p> <p>12. If SQG or Kansas generator is accumulating 2,200 lbs (1,000 kg) or more of hazardous waste (or 2.2 lbs (1 kg) or more of acutely hazardous waste), then check yes and continue with EPA generator requirements.</p> | <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> |
|--|---|

Storage Requirements:

☒ Compliance ☐ Non-Compliance ☐ NA

(Small quantity generator accumulating <1,000 Kilograms stop here)

Storage Requirements for Kansas and EPA Generators (GPT)

- | | YES | NO | NA | V# |
|---|--------------------------|--------------------------|-------------------------------------|----|
| 13. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 14. Is EPA generator storing hazardous waste for 90 days or less? KAR 28-31-4(g) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 15. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the generator's property line? (EPA Generator Only) KAR 28-31-4(g)(1)(A) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

(If waste(s) is placed in tanks complete the appropriate inspection checklist.)

Storage Requirements: ☐ Compliance ☐ Non-Compliance ☒ NA

Satellite Accumulation Requirements for Kansas and EPA Generators (GPT)

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--|
| 16. If the Kansas or EPA generator has satellite accumulation areas, | | | | |
| a. Is 55-gallons or less of each waste stream accumulated at or near the point of generation, in one container, which is under the control of the operator of the process generating that waste? KAR 28-31-4(j)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | |
| b. Is each container in good condition and closed except to add or remove waste? KAR 28-31-4(j)(1)(A) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | |
| c. Is each container marked with the words "Hazardous Waste"? KAR 28-31-4(j)(1)(B) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | |
| d. Is each container marked with the accumulation start date at the time more than 55-gallons is accumulated, or an additional container is started for the same waste stream? KAR 28-31-4(j)(2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| e. Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? KAR 28-31-4(j)(2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

Satellite Accumulation Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

Manifests (GMR)
YES NO NA V#

17. If a contractual agreement is used in place of manifesting? (Kansas Generators only)

- | | | | |
|---|--------------------------|--------------------------|-------------------------------------|
| a. Does the contractual agreement include the type of waste and frequency of shipments? KAR 28-31-4(d)(7)(A) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? KAR 28-31-4(d)(7)(B) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Is a copy of the agreement kept for a period of three years after termination of agreement? KAR 28-31-4(d)(7)(C) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

18. If required, is a hazardous waste manifest used? **KAR 28-31-4(d)(1)**

- | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|
| a. If yes, does each manifest include: | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 1. Generator EPA identification number (12 digit) and unique manifest document number (five digit)? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 2. Number of pages? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 3. Generator's name and mailing address? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4. Generator's phone number? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5. Each transporter's name? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 6. Each transporter's EPA identification number? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 7. Name and site address of designated facility? KAR 28-31-4(d)(1)(A) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 8. Designated facility's EPA identification number? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 9. Waste description (DOT shipping name, hazard class, packing group and identification number)? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| i. If applicable, are the requirements of 49 CFR 172.203(k) met? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Number and type of containers? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 11. Total quantity? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 12. Unit (weight or volume)? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 13. Special handling instructions (if applicable)? KAR 28-31-4(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 14. Generator's certification including waste minimization statement, generator's signature and date? KAR 28-31-4(d)(4)(A) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 15. Name, signature, and date of initial transporter? KAR 28-31-4(d)(4)(B) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| b. Does generator retain a copy of each manifest signed and dated by both generator and transporter? KAR 28-31-4(d)(4)(B) and/or KAR 28-31-4(d)(4)(C) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Does generator retain a copy of each manifest(s) signed and dated by T/S/D facility owner/operator for three years? KAR 28-31-4(f)(1)(A) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. If generator has failed to receive a signed copy of a manifest within 45 days of initiating a shipment, was an exception report filed? KAR 28-31-4(f)(4)(B) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 1. If yes, was copy retained for three years? KAR 28-31-4(f)(1)(B) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Manifesting Requirements:
☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

Land Disposal Restriction Requirements (GLB)

YES NO NA V#

19. If the generator's waste is **not** subject to the Land Disposal Restrictions regulations, please explain why: _____

20. If the generator sent waste **not meeting** the treatment standards to an off-site treatment or storage facility, did the generator provide a one-time written notice with the initial shipment of each different waste stream? **40 CFR 268.7(a)(2)**

☒ YES ☐ NO ☐ NA

 - a. Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? **40 CFR 268.7(a)(2)**

☒ YES ☐ NO ☐ NA

21. If the generator sent waste **meeting** the treatment standards to an off-site treatment, storage facility, or disposal facility, did the generator provide a one-time written notice and signed certification statement with the initial shipment to each TSD receiving the waste which certified the waste met the applicable treatment standards? **40 CFR 268.7(a)(3)**

☐ YES ☐ NO ☒ NA

 - a. Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? **40 CFR 268.7(a)(2)**

☐ YES ☐ NO ☐ NA

22. If the generator treated waste in tanks or containers to meet applicable treatment standards:
 - a. Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? **40 CFR 268.7(a)(5)**

☐ YES ☐ NO ☒ NA
 - b. If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? **40 CFR 268.7(a)(5)(iii)**

☐ YES ☐ NO ☒ NA

23. Has the generator retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site? **40 CFR 268.7(a)(8)**

☒ YES ☐ NO ☐ NA

24. If the generator claims that his characteristic waste is no longer hazardous:
 - a. Did the generator submit a one-time notice and signed certification to the KDHE and retain a copy for their files? **40 CFR 268.9(d)**

☐ YES ☐ NO ☒ NA
 - b. Is the information on the notice and certification current? **40 CFR 268.9(d)**

☐ YES ☐ NO ☒ NA

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations in the summary.

LDR Requirements:

☒ Compliance ☐ Non-Compliance ☐ NA

Special Conditions (GSC)

YES NO NA V#

25. If the generator has shipped/received hazardous waste to/from a foreign source, did they comply with the requirements of 40 CFR 262.53 and/or 40 CFR 262.54?

☐ ☐ ☒

If hazardous waste was shipped/received to/from a foreign source, please describe in summary.

Special Conditions Requirements:☐ Compliance ☐ Non-Compliance ☒ NA**Kansas Generator's Emergency Preparedness (GPT)**

26. Has generator designated one employee as emergency coordinator?

KAR 28-31-4(h)(6)☒ ☐

- a. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? **KAR 28-31-4(h)(6)**
- b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? **KAR 28-31-4(h)(9)**

☒ ☐☒ ☐

27. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? **KAR 28-31-4(h)(7)**

- a. Name and telephone number of the emergency coordinator(s)? **KAR 28-31-4(h)(7)(A)**
- b. Location of fire extinguishers and spill-control material and if available fire alarms? **KAR 28-31-4(h)(7)(B)**
- c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? **KAR 28-31-4(h)(7)(C)**

**SWITCHING
OVER FROM
AN APPROVED
CONTINGENCY
PLAN**

28. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? **KAR 28-31-4(h)(8)**

☒ ☐**KS Gen.'s Emergency Preparedness Requirements:**☐ Compliance ☐ Non-Compliance ☐ NA**Hazardous Waste Reporting (GRR)**

29. Has Kansas or EPA generator submitted an annual monitoring fee and report to KDHE? **KAR 28-31-10(g)(1) or KAR 28-31-10(g)(3)**

☒ ☐

30. Has EPA generator submitted a biennial report(s) to KDHE? **KAR 28-31-4(f)(2)(A)**

☐ ☐ ☒

- a. Does generator retain a copy of the report for three years? **KAR 28-31-4(f)(1)(B)**

☐ ☐ ☒**Hazardous Waste Reporting Requirements:**☒ Compliance ☐ Non-Compliance ☐ NA

Preparedness and Prevention (GPT)
--

YES NO NA V#

- | | |
|---|---|
| <p>31. Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? 40 CFR 265.31</p> <p>32. <u>If appropriate</u>, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:</p> <p style="margin-left: 20px;">a. Internal communication or alarm system easily accessible in case of emergency? 40 CFR 265.32(a)</p> <p style="margin-left: 20px;">b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? 40 CFR 265.32(b)</p> <p style="margin-left: 20px;">c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? 40 CFR 265.32(c)</p> <p style="margin-left: 20px;">d. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? 40 CFR 265.32(d)</p> <p style="margin-left: 20px;">e. Is this equipment (a-c above) tested and maintained to ensure its proper operation? 40 CFR 265.33</p> <p>33. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? 40 CFR 265.35</p> <p>34. <u>If appropriate</u>, for the type(s) of waste handled, has the generator made the following arrangements:</p> <p style="margin-left: 20px;">a. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? 40 CFR 265.37(a)(1)</p> <p style="margin-left: 20px;">b. Designated one authority where one or more police or fire departments might respond to an emergency? 40 CFR 265.37(a)(2)</p> <p style="margin-left: 20px;">c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? 40 CFR 265.37(a)(3)</p> <p style="margin-left: 20px;">d. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility. 40 CFR 265.37(a)(4)</p> <p>35. Do personnel have immediate access to an internal alarm or emergency communications device, either directly or through visual or contact with another employee, when handling hazardous waste (unless such a device is not required under § 265.32)? 40 CFR 265.34</p> <p>36. In cases where local authorities decline to enter into such arrangements, is the refusal documented? 40 CFR 265.37(b)</p> | <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> |
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Preparedness and Prevention Requirements:	<input checked="" type="checkbox"/> Compliance	<input type="checkbox"/> Non-Compliance	<input type="checkbox"/> NA
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(If Kansas generator, stop here)

= Violation Number

GENLIST04-16-03.wpd: Generator Checklist Revised April 16, 2003

Additional Information and Conclusions:

On May 19, 2003, I conducted a routine hazardous waste compliance inspection of Sabreliner Corporation, EPA identification number KSD 981 712 854, located at 101 Freedom Drive - Airport Industrial Park, Independence, Kansas 66701. The facility was previously know as Premier Turbines Independence. During my inspection, I discussed facility operations with John Heathman - Plant Engineer, Bruce Green - Calibration Lab Foreman, and Steve Hutchinson - Technician. Mr. Heathman served as facility's main contact for the inspection. Mr. Heathman has been employed at the facility for approximately 16 years. At the time of my inspection, the facility was classified as a Kansas Generator based upon the amount of hazardous waste generated.

Sabreliner employs 26 individuals and operates from 7:30 a.m. to 4:00 p.m. Monday through Friday to overhaul jet engine parts and accessories. Three structures are located at the site, the main production building, a hazardous material/waste storage building, and a small storage building. Since the last hazardous waste compliance inspection, the facility has downsized considerably mainly due to the loss of a large government contract to a Canadian company. Prior to the downsizing, the company was regulated for several years as an EPA Generator based on the amount of hazardous waste generated by the facility's operations.

The facility was last inspected January 7, 1999. As a result of that inspection, the facility was cited for the following violations:

1. Inaccurate notification,
2. Failure to include time on four weekly inspections,
3. Failure to conduct seven weekly inspections,
4. Illegal storage (over ninety days),
5. Obstructed aisle space,
6. Contingency plan inaccurate (physical address not correct),
7. Satellite accumulation containers not marked "Hazardous Waste,"
8. Open satellite accumulation container, and
9. Illegal disposal.

Prior to January 7, 1999, the facility was inspected on July 30, 1997. At the close of the 1997 inspection, the facility was cited for:

1. Failure to include date of remedial action on inspection documentation.
2. Eight accumulation containers not at or near the point of generation and under the control of the operator.
3. One open accumulation container.
4. Failure to use a proper DOT shipping description on manifests 00043, 00045, 00047, 00049, 00052, and 00054.
5. Failure to use the correct manifest number on LDRs for manifests 00043 through 00054.
6. Failure to provide a telephone or hand-held two-way radio for hazardous waste 90-day storage area.

7. Failure to familiarize local hospital as required by 40 CFR 265.37(a) (4).
8. Failure to list name(s), home address, and telephone number of two alternate emergency coordinators.
9. Contingency Plan does not describe actions to be taken to respond to fires, explosions, or releases of hazardous waste.
10. Contingency Plan does not describe arrangement made with emergency response agencies.
11. Contingency Plan does not list the location of all emergency equipment.
12. Contingency Plan does not include an evacuation plan that describes signals and evacuation routes.
13. Failure to have an established hazardous waste management training program.

Hazardous Waste Streams

Calibration Fluid - D001 - Used to simulate actual jet engine fuel in the Test Areas to test jet aircraft fuel controllers, pumps, and other various controls for the jet engines. The calibration fluid is cycled from a tank farm to the test area. The tank farms consists of a 300-gallon tank containing approximately 200 gallons of fluid and two 200-gallon tanks each containing approximately 150 gallons of fluid. Calibration fluid is not a routinely generated waste. It is only generated when a problems occurs, such as fluid being off-spec when received on-site, when it becomes contaminated with jet fuel or oil from a used motor, or when a hose breaks and the fluid leaks on the floor and has to be cleaned up and containerized. Facility personnel accumulate waste calibration fluid in metal 55-gallon drums. Since May 2002, two 55-gallon drums of waste calibration fluid has been generated at Sabreliner. At the time of my inspection, facility personnel were getting ready to clean out one of the 200 gallons tanks. According to Mr. Heathman and Mr. Green, no waste had been generated from tank cleaning operations for four or five years.

PD 680 - D001 - PD 680 is used in the Cleaning Department to clean fuel accessories (fuel controllers, pumps, and other various controls for the jet engines) to clean disassembled parts before inspection to determine wear and tear and replacement requirement. Waste PD 680 is accumulated on-site in a metal 55-gallon drum. Since May 2002, the facility has generated and shipped four drums of waste PD 680.

Isopropyl Alcohol 99% - D001 - Used in the Cleaning Department to disperse water in the PD 680 to assist in evaporation of water to prevent parts from rusting, waste isopropyl alcohol is also accumulated in metal 55-gallon drums. Since May 2002, the facility has generated and shipped 11 drums of waste isopropyl alcohol.

Turco 4181 and WO1 - D002 - Turco 4181, a sodium hydroxide solution, and WO1, a phosphoric acid solution, are used in the Cleaning Department to decarbonize jet engine spray bars. The wastes are accumulated in metal 55-gallon drums. Since May 2002, the facility has generated and shipped five drums. During the inspection, I talked with Mr. Heathman and Mr. Green about the possibility of facility personnel neutralizing the wastes

and then discharging the neutralized waste to the Independence POTW in lieu of shipping the waste off-site through Rineco to further reduce the amount of hazardous waste counted toward the facility's generation rate.

Paint Remover TT-R-248A - D007/F002 - The facility has finished the government contract that required the use of this substance and will only generate a small amount, less than 10 gallons annually, of this waste stream as a result of a commercial contract. Since May 2002, generated and shipped two metal 55-gallon drums.

Waste Wipes, Paint Filters, and Fuel Bench Filters - D007- Generated at various locations throughout the plant and accumulated in one metal 55-gallon satellite accumulation drum, the facility has generated and shipped one 55-gallon drum of this waste stream since May 2002.

Nonhazardous Waste Streams

X-IT Plus Ultra Cleaner - Nonhazardous - Used in Cleaning Department to clean fuel control components that don't require the use of PD 680 -- Accumulated metal 55-gallon drums and have generated and shipped 12 55-gallon drums since May 2002.

Hydraulic Fluid Royco 782 & 770 - Nonhazardous - Used to test aircraft hydraulic components. Waste generated when fluid viscosity and specific gravity no longer meets testing requirements. The contract this item was used for expired prior to January 1, 2002.

Waste Streams Not Currently Being Generated

WD40 Lubricant - D001 - WD40, used in the past to remove deposits on fuel nozzles, is not currently being used at the site. The military contract requiring the use of WD40 was lost. Since January 1, 2002, the facility has neither generated nor shipped any waste WD40.

Turco 5555B - D002 - The manufacturer discontinued this product in 2001. Sabreliner no longer has the contractor for which Turco 5555B was required; therefore, the facility has not attempted to locate a replacement for the substance.

Magnusol 755 - D002/F002/F004 - D002-F002-F004 - Used in Test Area to flush contaminants (dirt and/or metallic particles) from oil coolers. The waste is accumulated in 55-gallon metal containers. Due to the loss of a military contract, no waste Magnusol 755 has been generated or shipped since prior to January 1, 2002.

Mag-Chem HDL 264 - D002 - Potassium Hydroxide - Used in a pilot study test in an attempt to replace Turco 5555B several years earlier. The test showed that Mag-Chem HDL 264 did not work sufficiently to replace Turco 5555B. Facility personnel shipped less than five gallons of waste Mag-Chem HDL 264 off-site November 3, 2000.

VIOLATIONS

After completing my walk-through of the facility, reviewing the facility's paperwork pertaining to waste management, and discussing facility operations with Messrs. Heathman, Green, and Hutchinson, I cited Sabreliner Corporation for the following violation on the Notice of Non-Compliance issued at the close of the inspection.

K.A.R. 28-31-4(c)(1) - Inaccurate Notification - The most recently submitted Notification of Regulated Waste Activity form submitted for the company indicates the installation name to be Premier Turbines Independence, installation mailing address to be P.O. Box 946, Independence, Kansas, and installation contact to be Jimmy L. Johnson - Quality Engineer. According to Mr. Heathman, the name of the company is now and has always been Sabreliner Corporation, the company no longer has a post office box and the mailing address is now 101 Freedom Drive, and Jimmy L. Johnson retired two to three months prior to my inspection. During the inspection closeout, I gave Mr. Heathman the forms and instructions necessary to complete and submit a revised Notification in order to correct this violation.

During the inspection closeout, I also gave Mr. Heathman a copy of the hazardous waste regulations, Hazardous Waste Generator Handbook, and KDHE's technical guidance documents pertaining to closed containers and solvent rags/wipes.